LAGOMARSINO LAW

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

ANDRE M. LAGOMARSINO, ESQ. (#6711)

CORY M. FORD, ESQ. (#15042)

3005 W. Horizon Ridge Pkwy., #241

Henderson, Nevada 89052

Telephone: (702) 383-2864

Facsimile: (702) 383-0065

AML@lagomarsinolaw.com

cory@lagomarsinolaw.com

Attorneys for Plaintiff Linda Weil

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LINDA WEIL, an individual;

Plaintiff.

VS.

WALMART INC., a Foreign Corporation, and ROE ENTITIES I – X, inclusive,

Defendants.

CASE NO.: 2:21-cv-01631-JAD-EJY

STIPULATION AND ORDER TO EXTEND THE DEADLINE FOR PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR RECONSIDERATION (ECF NO. 47)

(First Request)

Plaintiff LINDA WEIL ("Plaintiff") and Defendant WALMART INC. ("Defendant"), by and through their counsel of record, hereby stipulate and request that this Court extend the deadline for Plaintiff to file her Opposition to Defendant's Motion for Reconsideration [ECF No. 47] ten (10) days, up to and including Thursday, February 2, 2023.

Plaintiff's counsel, which is a small firm of only three attorneys, had a seven-day long bench trial before the Honorable Judge Gordon, in the matter of *Kennedy et al. v. Las Vegas Sands Corp. et al.* 2:17-cv-200880-APG-VCF, which started on January 5, 2023. The Honorable Judge Gordon instructed both Plaintiffs' and Defendants' counsel to give all the younger associate attorneys an active role in the trial. Closing statements for that trial are scheduled for January 20, 2023. As a result, Plaintiff's firm has been significantly hindered in its ability to devote adequate time to drafting a response due to trial and trial preparations as well as now being occupied with multiple depositions during this week and the following week of January 23, 2023. The parties

Case 2:21-cv-01631-JAD-EJY Document 49 Filed 01/23/23 Page 2 of 2

aver that this is the first request for an extension of time with respect to this Motion, and this 1 2 request is made in good faith and not for purposes of delay as Plaintiff's counsel has been unable 3 to devote adequate time to drafting an opposition. 4 IT IS HEREBY STIPULATED AND AGREED between the parties that Plaintiff shall 5 have up to and including February 2, 2023, to file her Opposition to Defendant's Motion for 6 Reconsideration [ECF No. 47]. 7 DATED this 19th day of January, 2023 DATED this 19th day of January, 2023 8 9 LAGOMARSINO LAW **RESNICK & LOUIS P.C.** 10 3005 W. Horizon Ridge Pkwy., #241 • Henderson, Nevada 89052 Telephone (702) 383-2864 Facsimile (702) 383-0065 /s/ Cory Ford /s/ Eleanor Murphy 11 ELEANOR MURPHY, ESQ. (#15071) ANDRE LAGOMARSINO, ESQ. (#6711) CORY M. FORD, ESQ. (#15042) TROY A. CLARK, ESQ. (#11361) 12 3005 W. Horizon Ridge Pkwy., #241 MATTHEW B. BECKSTEAD, ESQ. (#14168) 13 Henderson, NV 89052 8925 W. Russell Road, Ste. 220 Attorneys for Plaintiff Linda Weil Las Vegas, NV 89148 14 Attorney for Defendant Walmart Inc. 15 16 IT IS SO ORDERED. The opposition deadline is extended to February 2, 2023. 17 DATED this 23rd day of January, 2023 18 19 20 UNITED STATES DISTRICT JUDGE 21 22 23 24 25 26 27 28

LAGOMARSINO LAW